

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

IN RE:

Armada Operating, Llc

Debtor(s)

Case No. 15-41556

Chapter 7

**MOTION TO APPROVE SALE OF PROPERTY FREE OF LIENS, CLAIMS  
AND ENCUMBRANCES, WITH LIENS, CLAIMS AND ENCUMBRANCES  
TO ATTACH TO SALES PROCEEDS**

**NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

COMES NOW, Linda Payne, the duly qualified and acting Chapter 7 Trustee for the above styled and numbered cause, and files this Motion to Approve Sale of Interest in Property Free of Liens, Claims and Encumbrances, with Liens, Claims and Encumbrances to Attach to Sales Proceeds (the "Motion"), pursuant to 11 U.S.C. §363(f) and Fed.R.Bankr.P. 6004(c), and in support hereof, would show the court as follows:

1. This Court has jurisdiction to hear this matter pursuant to 28 U.S.C. §§ 1334 and 157. This matter involves the sale of property of the estate and, thus, constitutes a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (N).

2. On August 28, 2015 ("Petition Date") Armada Operating, LLC ("Debtor") filed a voluntary petition under Chapter 7 of Title 11 of the United States Code (the "Bankruptcy Code") commencing the above-referenced bankruptcy proceeding. Movant is the Chapter 7 Trustee appointed in this case.

3. As of the Petition Date, two of the assets identified by Debtor on Schedule B of

its bankruptcy schedules are a 2012 Ford F-150 pickup and a 2008 Honda 4X4 ATV (the “Property”).

4. As of the Petition Date, the Debtor valued the Property at approximately \$12,000.00 and \$1,500.00 respectively.

5. Trustee has received an offer to purchase the Property from Tom Splechter, whose address is 1077 Osage Road, Yates Center, KS 66783 (“Purchaser”) for the sum of \$4,500.00 (the “Purchase Price”).

6. Trustee requests authority to sell the Property to Purchaser. Trustee believes the Purchase Price represents the fair market value of the Property and is in the best interest of the estate. The 2012 Ford F150 pickup has 100,000 miles and needs new tires. If the Property had to be picked up, moved and auctioned, the expenses would overshadow the value. The Trustee requests that (i) the sale be made “as is, where is” without any representations or warranties concerning the condition of the Property; and (ii) that no obligation, warranty or personal liability shall be placed on Trustee in any capacity, other than as Trustee of this estate.

7. Trustee requests authority to sell the Property free and clear of all liens, claims and encumbrances pursuant to Section 363(f)(3), (4) and/or (5) of the Bankruptcy Code with such liens, claims and encumbrances attaching to the sales proceeds.

8. Trustee further requests authorization to execute all documents necessary to consummate the closing of an approved sale.

### **PRAYER**

WHEREFORE, Trustee prays that the Court enter an order pursuant to 11 U.S.C. § 363(f) authorizing her to sell the Property to Purchaser as described above free and clear of any and all

liens, claims and encumbrances with any and all such liens, claims and encumbrances attaching to the sale proceeds and granting the Trustee such other and further relief to which she is justly entitled.

Dated: September 23, 2015

Respectfully submitted,

THE MOORE LAW FIRM, L.L.P.

/s/ Bill F. Payne

BILL F. PAYNE, SBN 15649500

100 North Main Street

Paris, Texas 75460

Telephone 903-784-4393 or 972-628-4901

Facsimile 903-785-0312

ATTORNEY FOR TRUSTEE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served on the persons listed on the attached mailing matrix through the court's electronic notification system as permitted by Appendix 5005 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage pre-paid, on September 23, 2015.

/s/ Bill F. Payne  
Bill F. Payne

Label Matrix for local noticing  
0540-4

Case 15-41556

Eastern District of Texas

Sherman

Wed Sep 23 10:08:44 CDT 2015

Archer Directional Drilling Services, LLC  
c/o Carl Dore', Jr.  
Dore' Law Group, P.C.  
17171 Park Row, Suite 160  
Houston, TX 77084-4927

Bio-Action, Inc  
P O Box 2425  
Casper WY 82602-2425

Decollement Consulting, Inc  
13300 Braun Rd  
Golden CO 80401-1645

Everardo Rodriguez  
519 S Cedar Street  
Garnett KS 66032-1517

Lyon-Coffey Electric Cooperative In  
P O Box 229  
Burlington KS 66839-0229

Midwest Surveys, Inc  
P O Box 68  
Osawatomie KS 66064-0068

Pason Systems USA Corp  
16035 Table Mountain Parkway  
Golden CO 80403-1642

Railroad Commission Of Texas  
P-5 Financial Assurance Unit  
P O Box 12967  
Austin TX 78711-2967

Smith International, Inc  
P O Box 732136  
Dallas TX 75373-2136

Anchor Drilling Fluids USA, Inc  
P O Box 1390  
Tulsa OK 74101-1390

Armada Operating, LLC  
5220 Spring Valley Rd  
Suite 615  
Dallas, TX 75254-2431

Collins Automotive  
P O Box 22  
Piqua KS 66761-0022

Delta Seaboard, LLC  
1212 W Sam Houston Pkwy N  
Houston TX 77043-4009

Frontier Drilling, LLC  
1608 NW Expressway, Ste 102  
Oklahoma City OK 73118-1440

MacLaskey Oilfield Services, Inc  
105 N Industrial Road  
El Dorado KS 67042

NOV Tuboscope  
7909 Parkwood Circle Drive  
Houston TX 77036-6565

Linda S Payne  
Chapter 7 Bankruptcy Trustee  
12270 Coit Road, Suite 541  
Dallas, TX 75251

Reef Services, LLC  
P O Box 203187  
Dept 18703  
Dallas TX 75320-3187

TS Construction General Contractor  
1586 Highway 54  
Yates Center KS 66783-5201

Archer Directional Drilling  
10613 W Sam Houston Pkwy Ste 600  
Houston TX 77064-4663

Jennifer Klein Ayers  
K&L GATES, LLP  
1717 Main Street, Suite 2800  
Dallas, TX 75201-7342

D & D Propane, Inc  
P O Box 296  
Humboldt KS 66748-0296

Carl Dore  
Dore Law Group, PC  
17171 Park Row, Ste 160  
Houston, TX 77084-4927

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
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PHILADELPHIA PA 19101-7346

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Houston, TX 77084-4927

Oil Patch Pump & Supply, Inc  
Iola Store  
P O Box 591  
Chanute KS 66720-0591

Piqua Farmers Co-operative Assn  
201 S Washington  
Piqua KS 66761-1673

Sievers Auto, Inc  
806 W Mary  
Yates Center KS 66783-2300

Tforce Energy Services, Inc  
6143 S Willow Dr, Ste 230  
Englewood CO 80111-5124

Twin Motors Ford, Inc  
P O Box 844  
Iola KS 66749-0844

U.S. Attorney General  
Department of Justice  
Main Justice Building  
10th & Constitution Ave., NW  
Washington, DC 20530-0001

Document  
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Tyler, TX 75702-7231

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Tyler TX 75702-0204

Verde Oil Company  
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Savonburg KS 66772-4062

Weatherford US LP  
P O Box 301003  
Dallas TX 75303-1003

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Dallas, TX 75251-1366

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K&L Gates LLP  
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Dallas, TX 75201-7342

ZECO Equipment, LLC  
P O Box 1459  
Vernal UT 84078-1459

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service  
Special Procedures  
1100 Commerce, Room 951  
STOP 5025 DAL  
Dallas TX 75242

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Prosperity Bank

End of Label Matrix  
Mailable recipients 38  
Bypassed recipients 1  
Total 39